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& GRANNIS LLP

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MAY 17 2013

Federal Communications Commission  
Office of the Secretary

May 17, 2013

Marlene H. Dortch  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

**REDACTED – FOR PUBLIC INFORMATION**

Re: *Numbering Policies for Modern Communications*, WC Docket No. 13-97, *IP-Enabled Services*, WC Docket No. 04-36, *Telephone Number Requirements for IP-Enabled Services Providers*, WC Docket No. 07-243, *Telephone Number Portability*, CC Docket No. 95-116, *Developing a Unified Inter-carrier Compensation Regime*, CC Docket No. 01-92, *Connect America Fund*, WC Docket No. 10-90, *Numbering Resource Optimization*, CC Docket No. 99-200, *Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the Commission's Rules Regarding Access to Numbering Resources*, *Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of the Commission's Rules*

Dear Ms. Dortch:

Vonage Holdings Corp. ("Vonage") hereby submits, pursuant to the Protective Order in CC Docket No. 99-200, Vonage's proposal for a trial of direct access to numbers. Copies of the Confidential filing have been provided to the Secretary's office and to Marilyn Jones in the Wireline Competition Bureau.

If you have questions or require any additional information, please do not hesitate to contact me at (202) 730-1346 or bstrandberg@wiltshiregrannis.com.

Sincerely,

Brita D. Strandberg  
Counsel to Vonage Holdings Corp.

cc: William Dever  
Lisa Gelb  
Marilyn Jones  
Ann Stevens  
Sanford Williams



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Dear Ms. Dortch:

Pursuant to Paragraph 101 of the *Notice of Proposed Rulemaking, Order, and Notice of Inquiry* issued in the above captioned proceedings ("*Numbering Order*") on April 18, 2013, Vonage Holdings Corp. ("Vonage") hereby submits its proposal for a trial of direct access to numbers to the Wireline Competition Bureau. Vonage is also submitting this proposal to the relevant state commissions, as required by the *Numbering Order*.

**1. Certification**

Vonage's certification that it will comply with all terms and conditions of the waiver granted in the *Numbering Order* is attached.

**2. Direct Assignment Rate Centers and LATAs**

Vonage hereby informs the Commission of the specific Rate Centers and LATAs in which it proposes to receive numbers, as well as the amount of new numbers requested in each rate center or LATA, and the amount of numbers Vonage intends to port from existing or new customers in each rate center or LATA.<sup>2</sup> To facilitate the smooth deployment of the proposed trial, Vonage will file the requisite state notices for number allocations and work closely with the relevant numbering administrators throughout the trial.

<sup>1</sup> An unredacted version of this letter has been simultaneously filed in CC Docket No. 99-200 pursuant to the protective order in that proceeding.

<sup>2</sup> *Numbering Order* at ¶ 101.

**REDACTED – FOR PUBLIC INFORMATION**

***a. Ported Numbers***

Vonage proposes to undertake the trial of direct access to numbers described in the *Numbering Order* in three LATAs: [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]. Vonage will seek an LRN in the [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] (the “LRN Rate Centers”). Vonage will, as required by relevant industry guidelines and practices,<sup>3</sup> request a 10,000 block in each of the LRN Rate Centers. Vonage will return unutilized blocks from each 10,000 block to the Pooling Administrator as soon as reasonably practicable after receipt. The remaining numbers (other than the LRN) in each of the LRN Rate Centers will be available for assignment as New Numbers as discussed in Part 2.b below.

The chart below indicates the maximum number of numbers that Vonage will port in from new or existing customers (“Ported Numbers”) in each of the trial LATAs:

LATA	Ported Telephone Numbers
[BEGIN CONFIDENTIAL]	
[REDACTED]	50,000
[REDACTED]	37,000
[REDACTED]	33,000
[END CONFIDENTIAL]	

***b. New Numbers***

Vonage proposes to use nine 1,000 blocks to support assignment of directly accessed numbers to new customers. Specifically, Vonage will use the A block in each of the LRN Rate Centers and proposes to obtain additional 1,000 blocks in the following Rate Centers: [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] (the “New Number Rate Centers”). As the trial proceeds, Vonage may propose to receive additional 1,000-blocks as provided in the *Numbering Order*.<sup>4</sup>

The chart below indicates the maximum number of directly-accessed numbers Vonage proposes to assign to end-user customers as new numbers (“New Numbers”) in each Rate Center:

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<sup>3</sup> *Id.* ¶ 105.

<sup>4</sup> *Id.* ¶ 100.

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LATA/Rate Center	New Customer Telephone Numbers
[BEGIN CONFIDENTIAL]	
	1,000
	1,000
	1,000
	1,000
	1,000
	999
	999
	999
	1,000
[END CONFIDENTIAL]	

**3. Phase-In Process**

Vonage proposes the following phase-in process to implement the numbering trial.

Pre-Trial

Apply to obtain number blocks from the numbering administrators for the [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] LATAs shortly after the Wireline Competition Bureau approves the Vonage test proposal.

Alpha Stage—validation testing

Anticipated to be within two weeks of receipt of LRNs:

**Step 1:** Vonage will load newly received number blocks in industry databases and establish LRNs in LATAs [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] and configure to Switch Homing Arrangement (“SHA”) in LERG & NPAC.

**Step 2:** Provision test numbers from each LRN A Block to Vonage test accounts and begin testing inbound PSTN-to-Vonage call routing.

Beta Stage—validation testing

Anticipated to be within four weeks of receipt of LRNs:

**Step 3:** Issue Local Service Requests (LSRs) to port test accounts from underlying carrier(s) with whom Vonage has SHAs to Vonage OCN.

**Step 4:** Monitor tested accounts to validate successful port to Vonage OCN within NPAC database.

**Step 5:** Place test calls to validate routing.

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*Production—live accounts*

Anticipated to be within six weeks of receipt of LRNs:

**Step 6:** Enable customers to take Vonage OCN designated numbers in the New Number Rate centers.

Anticipated to be within eight weeks of receipt of LRNs:

**Step 7:** Begin porting of 1) new ordered customer ports and 2) migration of existing customers in each LATA pursuant to the following schedule:

LATA	Alpha	Beta	Production				
	<i>Success Based</i>	<i>Success Based</i>	<i>Week 1</i>	<i>Week 2</i>	<i>Week 3</i>	<i>Week 4</i>	<i>Week 5</i>
[BEGIN CONFIDENTIAL]							
	<50	<500	1,000	3,000	10,000	10,000	10,000
	<50	<500	1,000	3,000	10,000	15,000	20,000
	<50	<500	1,000	5,000	10,000	10,000	4,000
[END CONFIDENTIAL]							
Total TNs	<150	<1,500	3,000	11,000	30,000	35,000	34,000
Cumulative – End of Stage Count	150	1650	4,650	15,650	45,650	80,650	114,650

If you have questions or require any additional information, please do not hesitate to contact me at (202) 730-1346 or bstrandberg@wiltshiregrannis.com.

Sincerely,



Brita D. Strandberg  
*Counsel to Vonage Holdings Corp.*

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Ann Stevens  
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## **CERTIFICATION**

*Numbering Policies for Modern Communications, WC Docket No. 13-97*

*IP-Enabled Services, WC Docket No. 04-36*

*Telephone Number Requirements for IP-Enabled Services Providers, WC Docket No. 07-243*

*Telephone Number Portability, CC Docket No. 95-116*

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*Connect America Fund, WC Docket No. 10-90*

*Numbering Resource Optimization, CC Docket No. 99-200*

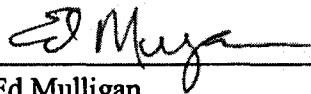
*Petition of Vonage Holdings Corp. for Limited Waiver of Section 52.15(g)(2)(i) of the  
Commission's Rules Regarding Access to Numbering Resources*

*Petition of TeleCommunication Systems, Inc. and HBF Group, Inc. for Waiver of Part 52 of  
the Commission's Rules*

Pursuant to Paragraph 101 of the Notice of Proposed Rulemaking, Order, and Notice of Inquiry issued in the above-referenced proceedings ("Numbering Order") on April 18, 2013, Vonage Holdings Corp. ("Vonage") hereby certifies that it will comply with all terms and conditions of the waiver granted in the Numbering Order.

Vonage represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. Vonage also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Ed Mulligan

Vice President of Carrier Operations

May 17, 2013

### Timeline of Phase-In Process<sup>1</sup>

Stage/Week		Description	Total/Cumulative TNs
Pre-Trial		<ul style="list-style-type: none"> <li>Apply to obtain number blocks from the numbering administrators in three LATAs: <ul style="list-style-type: none"> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]</li> </ul> </li> </ul>	
Alpha Stage	Week 1	<ul style="list-style-type: none"> <li>Load newly received number blocks in industry databases and establish LRNs in LATAs.</li> <li>Configure to Switch Homing Arrangement (“SHA”) in LERG &amp; NPAC</li> <li>Provision test numbers from each LRN A Block to Vonage test accounts: <ul style="list-style-type: none"> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: &lt;50</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: &lt;50</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: &lt;50</li> </ul> </li> <li>Begin testing inbound PSTN-to-Vonage call routing</li> </ul>	Total TNs: <150
	Week 2		
Beta Stage	Week 3	<ul style="list-style-type: none"> <li>Issue Local Service Requests (LSRs) to port test accounts from underlying carrier(s) with whom Vonage has SHAs to Vonage OCN: <ul style="list-style-type: none"> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: &lt;500</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: &lt;500</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: &lt;500</li> </ul> </li> <li>Monitor tested accounts to validate successful port to Vonage OCN within NPAC database</li> </ul>	Total TNs: <1,500 Cumulative: <1,650
	Week 4		
Production	Week 5	<ul style="list-style-type: none"> <li>Enable customers to take Vonage OCN designated numbers in the New Number Rate Centers.</li> </ul>	
	Week 6		
	Week 7	<ul style="list-style-type: none"> <li>Begin porting of 1) new ordered customer ports and 2) migration of existing customers in each LATA.</li> <li>Production Week 1: <ul style="list-style-type: none"> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 1,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 1,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 1,000</li> </ul> </li> </ul>	Total TNs: 3,000 Cumulative: 4,650
	Week 8	<ul style="list-style-type: none"> <li>Production Week 2: <ul style="list-style-type: none"> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 3,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 3,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 5,000</li> </ul> </li> </ul>	Total TNs: 11,000 Cumulative: 15,650
	Week 9	<ul style="list-style-type: none"> <li>Production Week 3: <ul style="list-style-type: none"> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 10,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 10,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 10,000</li> </ul> </li> </ul>	Total TNs: 30,000 Cumulative: 45,650
	Week 10	<ul style="list-style-type: none"> <li>Production Week 4: <ul style="list-style-type: none"> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 10,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 15,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 10,000</li> </ul> </li> </ul>	Total TNs: 35,000 Cumulative: 80,650
	Week 11	<ul style="list-style-type: none"> <li>Production Week 5: <ul style="list-style-type: none"> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 10,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 20,000</li> <li>LATA [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]: 4,000</li> </ul> </li> </ul>	Total TNs: 34,000 Cumulative: 114,650

<sup>1</sup> Proposed dates are “anticipated within” dates (e.g., the proposed actions in Alpha stage are anticipated to take place within two weeks after receipt of LRNs).